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February 21, 2022

**VIA ECF**

Honorable Sidney H. Stein  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**MEMO ENDORSED**

Re: United States v. Rakim Brown, S4 19 Cr. 513 (SHS)

Dear Judge Stein:

I am CJA-appointed counsel to Rakim Brown in the above-referenced matter and respectfully request that the Court direct the MDC to provide Mr. Brown with daily access to a computer to review discovery using hard-drives containing electronic discovery.

Trial is March 7, 2022, and Mr. Brown has not been provided access to a computer to review his electronic discovery for months. The MDC has not responded to my written requests (February 11, 2022 and February 17, 2022) for Mr. Brown to be given computer access to review discovery. As the Court may recall when the trial was previously scheduled for March 2021, the MDC committed to providing Mr. Brown with daily access to a computer and hard drive so that he could review discovery and assist with the defense. See Dkt. 90 (February 25, 2021 letter from the Government to the Court stating that, after speaking with legal counsel at MDC, Mr. Brown "will have daily access, excluding weekends and holidays" to a computer and hard drive). The Government sent a second hard-drive containing voluminous discovery to the MDC on Friday, February 18, 2022, and Mr. Brown will need to review those materials on a regular basis to assist in his defense. I have conferred with the Government on this issue, and I understand that they have followed-up on this issue with the MDC as well.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
Rita M. Glavin

2/22/22  
Sonded.  
Sid H Stein  
USDC

cc: AUSAs Rothman, Andrews, Brumwell (via ECF)